

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

DIVISION 80 LLC,

Plaintiff,

v.

MERRICK GARLAND, in his official
capacity as Attorney General of the
United States *et al.*,

Defendants.

Case No. 3:22-cv-00148

District Judge Jeffrey V. Brown

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants hereby move this Court to extend the time for Defendants to answer or otherwise respond to Plaintiff's Complaint until 30 days after the Court rules on Plaintiff's pending Motion for a Preliminary Injunction (ECF No. 11). Otherwise, Defendants' responsive pleading to Plaintiff's Complaint would be due July 11, 2022. Defendants have conferred with Plaintiff concerning this motion, and Plaintiff does not oppose Defendants' request for an extension of time.

Good cause exists for such an extension. A ruling on the preliminary injunction motion may serve to narrow or clarify the issues remaining to be resolved with respect to the Complaint. Accordingly, extending the time for Defendants to answer or otherwise respond until 30 days after the Court resolves that motion will likely conserve the Court's and the parties' resources. No previous extensions have been sought or granted.

Defendants therefore respectfully request that their motion for extension of time be granted. In accordance with this Court's Local Rules, a proposed order is attached.

DATED: July 7, 2022

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney
General

ALEXANDER K. HAAS
Director, Federal Programs Branch

LESLEY FARBY
Assistant Director, Federal Programs
Branch

/s/ Daniel Riess
DANIEL RIESS
MARTIN M. TOMLINSON
TAISA GOODNATURE
Trial Attorneys
Civil Division, Federal Programs Branch
U.S. Department of Justice
1100 L Street, NW
Washington, DC 20005
Phone: (202) 353-3098
Email: Daniel.Riess@usdoj.gov
Attorneys for Defendants

CERTIFICATE OF CONFERENCE

I certify that, on July 7, 2022, I conferred with Plaintiff's counsel, who stated that Plaintiff is not opposed to the relief sought in this motion.

/s/ Daniel Riess